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6 Attorneys for Defendant
7 AMERICAN EXPRESS TRAVEL RELATED SERVICES
COMPANY, INC.
8

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 SANDRA VERMA,

13 Plaintiff,

14 v.

15 AMERICAN EXPRESS, a New York
corporation; and DOES 1-25, inclusive,

16 Defendants.
17

) Case No. 08-CV-02702 SI
)

) Judge: Hon. Susan Illston
) Ctrm.: 10, 19th Floor
)

) **STIPULATION AND [PROPOSED]**
) **ORDER EXTENDING EXPERT**
) **DISCOVERY DEADLINES**
)

) Action Filed: April 17, 2008
) Trial Date: September 21, 2009
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1 Plaintiff Sandra Verma (“Plaintiff”) and defendant American Express Travel Related
 2 Services Company, Inc. (“TRS”), by and through their respective counsel of record in this action,
 3 hereby present the following Stipulation and Proposed Order extending the deadlines pertinent to
 4 expert discovery in this case as follows:

5 WHEREAS, Plaintiff filed this action on April 17, 2008;

6 WHEREAS, this case is currently set for trial beginning September 21, 2009;

7 WHEREAS, the current deadline for the parties to designate their respective experts
 8 pursuant to Federal Rule of Civil Procedure 26(a)(2) is April 20, 2009;

9 WHEREAS, the Court indicated at the Case Management Conference held in this matter on
 10 March 20, 2009 that it would consider a stipulation by the parties seeking an order extending the
 11 deadlines pertinent to expert discovery in this case;

12 WHEREAS, the parties agree that, given the current status of the litigation, extending the
 13 current deadlines pertinent to expert discovery in this case as set forth below will best facilitate the
 14 efficient handling of this litigation going forward;

15 WHEREAS, pursuant to Northern District Civil Local Rule 6-2(a), the Declaration of
 16 Connor J. Moyle in support of the parties’ Stipulation and Proposed Order is filed concurrently
 17 herewith;

18 WHEREAS, the parties jointly stipulate, pursuant to Northern District Civil Local Rules
 19 6-1(b) and 6-2, to request that the Court issue an order extending the deadlines pertinent to expert
 20 discovery in this matter as set forth below:

21 IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES AND THEIR
 22 COUNSEL OF RECORD THAT:

23 (1) The deadline for the parties’ respective designation of experts pursuant to Federal
 24 Rule of Civil Procedure 26(a)(2), currently set for April 20, 2009, shall be extended to June 8,
 25 2009;

26 (2) The deadline for the parties’ respective designation of rebuttal experts, currently set
 27 for May 1, 2009, shall be extended to June 19, 2009;

28 (3) The expert discovery cut-off date, currently set at June 22, 2009, shall be extended

1 to August 10, 2009.

2 IT IS SO STIPULATED.

3 Dated: April 10, 2009

CARLTON DiSANTE & FREUDENBERGER LLP
Leigh A. White
Connor J. Moyle

6 By: /S/ - Connor J. Moyle

Connor J. Moyle

7 Attorneys for Defendant
8 AMERICAN EXPRESS TRAVEL RELATED SERVICES
COMPANY, INC.

9 Dated: April 10, 2009

PIERCE & SHEARER LLP
Andrew F. Pierce
Stacy A. Smith

12 By: /S/ - Stacy A. Smith

Stacy A. Smith

13 Attorneys for Plaintiff
14 SANDRA VERMA

16 IT IS HEREBY ORDERED THAT:

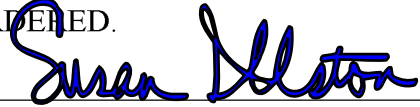
17 (1) The deadline for the parties' respective designation of experts pursuant to Federal
18 Rule of Civil Procedure 26(a)(2), currently set for April 20, 2009, shall be extended to June 8,
19 2009;

20 (2) The deadline for the parties' respective designation of rebuttal experts, currently set
21 for May 1, 2009, shall be extended to June 19, 2009;

22 (3) The expert discovery cut-off date, currently set at June 22, 2009, shall be extended
23 to August 10, 2009.

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

26 Dated: _____


The Honorable Susan Illston
Judge of the United States District Court for
The Northern District of California